

1 **PATRICK W. KANG, ESQ.**

State Bar No.: 010381

2 **ERICA D. LOYD, ESQ.**

State Bar No.: 010922

3 **KANG & ASSOCIATES, PLLC.**

6480 W. Spring Mountain Road, Suite 1

Las Vegas, Nevada 89146

5 P: 702.333.4223

F: 702.507.1468

6 *Attorneys for Plaintiffs*

8  
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 BETTY HARRIS, an Individual; *et. al.*,

Case No.: 2:15-cv-00984-RCJ-VCF

12  
13  
14 Plaintiffs,

15 vs.

16 SECAF, DEBORAH LEE JAMES, Secretary of  
U.S. AIR FORCE, *et. al.*,

17  
18 Defendants.

19  
20 **STIPULATION TO EXTEND TIME FOR**  
21 **THE EARLY NEUTRAL EVALUATION STATEMENT**

22 Plaintiff BETTY HARRIS, ET AL., ("Plaintiffs") and Defendant SECAF and DEBORAH  
23 LEE JAMES ("Defendants"), by and through their respective counsel of record, hereby  
24 stipulate, agree, and respectfully request to extend the date for the Early Neutral Evaluation  
25 (ENE) Statement presently due on February 23, 2016, before Honorable Nancy J. Koppe  
(Doc. #15). Although this request is untimely pursuant to this Court's December 4, 2015

Order, Docket No. 15, the parties respectfully request this extension due to unforeseen circumstances. Ms. Loyd is currently out of town for a family funeral and will not return until February 24, 2016. Accordingly, the parties would like to extend the due date of the ENE Statement to February 25, 2016, which is mutually agreeable between the parties.

This extension is sought in good faith, and not for the purpose of undue delay.

Respectfully Submitted By:

DATED this 17<sup>th</sup> day of February, 2016

DATED this 17<sup>th</sup> day of February, 2016

/s/Erica D. Loyd  
ERICA D. LOYD  
State Bar : 10922  
KANG & ASSOCIATES, PLLC  
6480 W. Spring Mountain Rd.  
Las Vegas, NV 89146  
P: 702.333.4223  
F: 702.507.1468  
eloyd@acelawgroup.com  
*Attorney for Plaintiff*

/s/Krystal J. Rosse, Esq.  
Krystal J. Rosse, Esq.  
Assistant United States Attorney  
333 Las Vegas Blvd S  
Suite 5000  
Las Vegas, Nevada 89101  
P: 702.388.6336  
F: 702.388.6787  
krystal.rosse@usdoj.gov  
*Attorney for Defendant*

For good cause shown, the deadline for the parties' Early Neutral Evaluation statement shall be extended to February 25, 2016. All other requirements of the Court's order setting the ENE session remain in effect.

**IT IS SO ORDERED.**

Dated: February 18, 2016  
\_\_\_\_\_

  
\_\_\_\_\_  
**NANCY J. KOPPE**  
United States Magistrate Judge